## IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF TENNESSEE NASHVILLE DIVISION

BRAD AMOS,	
Plaintiff,	
VS.	Case No: 3:21-cv-00923
	]
THE LAMPO GROUP, LLC, d/b/a	Judge Richardson/Holmes
RAMSEY SOLUTIONS; and DAVE	
RAMSEY,	JURY DEMAND
	]
Defendants.	ĺ
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## MOTION TO EXTEND TIME FOR RESPONSE TO MOTION TO DISMISS

Defendants in this matter have now filed a *third* Motion to Dismiss making new allegations not presented in the previous two. (Docs 28 and 29). Pursuant to Local Rule 7.01 response dates for these new Motions would be March 29 and March 30. While Plaintiff understands Defendant has every right to file these Motions, responding to them requires a great deal of work to respond.

Plaintiff's attorneys are in depositions all day on March 29, have a discovery dispute hearing scheduled for March 25 in an arbitration, and have initial case management conferences and discovery responses all due on or before March 30. Plaintiff's attorneys will have to spend a great deal of time preparing for these events in addition to responding to these Motions.

Discovery in this matter is not stayed while these Motions are pending and the parties have both exchanged first sets of written discovery; as such the case will not be delayed by granting this request.

Further, if either Defendant were to request an additional week to file replies to Plaintiff's responses; Plaintiff will not object.

Plaintiffs respectfully request this court allow Plaintiff one additional week to respond, making the deadlines to respond April 5 and April 6.

Respectfully submitted,

THE EMPLOYMENT AND CONSUMER LAW GROUP

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Attorneys for Plaintiff

## **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and accurate copy of the foregoing was served via the Court's electronic filing system this 24th day of March, 2022 to the following:

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/s/ Jonathan Street
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